

# **EXHIBIT D**

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX**

-----X  
ALTHEA BEAZER,

Plaintiff,

-against -

**Index No.: 810512/2022E**

**STIPULATION  
EXTENDING TIME  
TO FILE COMPLAINT**

REBEKAH REHAB & EXTENDED CARE CENTER,  
KENNETH GELB, CONNIE CAPALDO, and  
IVAN RAMKHELAWAN-SIN,

Defendants.

-----X

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned counsel that:

1. Plaintiff's time to file her Complaint shall be extended from December 19, 2022, to January 2, 2023.

**IT IS FURTHER STIPULATED AND AGREED**, that this Stipulation may be executed in counterparts and such counterparts together shall constitute the entire Stipulation. Fax/email signatures shall be deemed originals.

**Dated: New York, New York**  
**December 1, 2022**

**GODDARD LAW PLLC**

/s/ Megan S. Goddard

Megan S. Goddard, Esq.  
39 Broadway, Suite 1540  
New York, New York 10006  
Tel: 646-964-1178  
Mgoddard@goddardlawnyc.com

*Attorneys for Plaintiff Althea Beazer*

**WALSH PIZZI O'REILLY FALANGA, LLP**

*/s/ David D. Cramer*

David D. Cramer, Esq.  
Three Gateway Center  
100 Mulberry Street, 15th Floor  
Newark, NJ 07102  
Tel: 973-757-1100  
dcramer@walsh.law

*Attorneys for Rebekah Rehab & Extended Care, Kenneth Gelb, Connie Capaldo, and Ivan Ramkhelawan-Singh*

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX**

-----x  
ALTHEA BEAZER,

Plaintiff,

-against -

**Index No.: 810512/2022E**

**STIPULATION  
EXTENDING TIME  
TO FILE COMPLAINT**

REBEKAH REHAB & EXTENDED CARE CENTER,  
KENNETH GELB, CONNIE CAPALDO, and  
IVAN RAMKHELAWAN-SIN,

Defendants.

-----x

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned counsel that:

1. Plaintiff's time to file her Complaint shall be extended from December 19, 2022, to January 2, 2023.

**IT IS FURTHER STIPULATED AND AGREED**, that this Stipulation may be executed in counterparts and such counterparts together shall constitute the entire Stipulation. Fax/email signatures shall be deemed originals.

**Dated: New York, New York**  
**December 1, 2022**

**GODDARD LAW PLLC**

/s/ Megan S. Goddard

Megan S. Goddard, Esq.  
39 Broadway, Suite 1540  
New York, New York 10006  
Tel: 646-964-1178  
Mgoddard@goddardlawnyc.com

*Attorneys for Plaintiff Althea Beazer*

**WALSH PIZZI O'REILLY FALANGA, LLP**

*/s/ David D. Cramer*

David D. Cramer, Esq.  
Three Gateway Center  
100 Mulberry Street, 15th Floor  
Newark, NJ 07102  
Tel: 973-757-1100  
dcramer@walsh.law

*Attorneys for Rebekah Rehab & Extended Care, Kenneth Gelb, Connie Capaldo, and Ivan Ramkhelawan-Singh*